### VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

669 County Square Drive Ventura, CA 93003 805/645-1400

### **PART 70 PERMIT**

Number 1493

Permit Term: April 1, 1998 to March 31, 2003

Company Name / Address Facility Name / Address

Chevron, USA Platform Grace
646 County Square Drive OCS Lease P-0217
Ventura, CA 93003 Offshore of Ventura, CA

Mr. G. Steinbach Mr. Allen Hein Ventura Profit Center Manager Title V Contact 805/658-4300 805/658-4357

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

For:

Karl E. Krause, Manager Richard H. Baldwin
Engineering Section Air Pollution Control Officer

M:TITLEV-PERMIT1493

### CHEVRON USA OCS PLATFORM GRACE PART 70 PERMIT NO. 1493 TABLE OF CONTENTS

- 1. Permit Cover Sheet
- 2. Permitted Equipment and Applicable Requirements Table
- 3. Permitted Throughput and Consumption Limit Table
- 4. Permitted Emissions Table
- 5. Oil Well List
- 6. Exempt Equipment List
- 7. Specific Applicable Requirements (Attachments)
  - a. Rule 71.1, Crude Oil Production and Separation (71.1N1)
  - b. Rule 71.4, Petroleum Sumps, Pits, Ponds and Well Cellars (71.4N3)
  - c. Rule 74.9, Stationary Internal Combustion Engines (74.9N3, 74.9N8,74.9N9)
- 8. Permit Specific Conditions (Attachments)
  - a. General Recordkeeping Requirements (PO1493PC1)
  - b. Natural Gas Only Requirement (PO1493PC1)
  - c. Maximum Number of Oil Wells (PO1493PC1)
  - d. Maximum Sulfur Content of Diesel Fuel (PO1493PC1)
  - e. Workboat and Crew Boat Usage Limitation (PO1493PC1)
  - f. Solvent Wipe Cleaning Additional Requirements (PO1493PC1)
  - g. Flare Additional Requirements (PO1493PC2)
  - h. Caterpillar Diesel Backup Generator Additional Requirements (PO1493PC3)
  - i. Out of Service Tank Requirements (PO1493PC4)
  - j. Waukesha Generator Engine Additional Requirements (PO1493PC5)
  - k. North and South Crane Additional Requirements (PO1493PC6)
  - 1. Out of Service Turbine Requirements (PO1493PC7)
- 9. General Applicable Requirements (Attachments)
  - a. Rule 50, Opacity (50)
  - b. Rule 52, Particulate Matter Concentration (52)

- c. Rule 54.B.1, Sulfur Compounds SO<sub>x</sub> at Point of Discharge (54.B.1, OCS)
- d. Rule 54.B.2, Sulfur Compounds  $SO_X$  at or Beyond Property Line (54.B.2, OCS)
- e. Rule 57.B, Combustion Contaminants Fuel Burning (57.B)
- f. Rule 64.B.1, Sulfur Content of Fuels Gaseous Fuels (64.B.1)
- g. Rule 64.B.2, Sulfur Content of Fuels Solid or Liquid Fuels (64.B.2)
- h. Rule 68, Carbon Monoxide (68)
- i. Rule 71.1.C, Crude Oil Production and Separation Produced Gas (71.1.C)
- j. Rule 71.4.B.1, First Stage Sump Prohibition (71.4.B.1)
- k. Rule 71.4.B.3, Well Cellar Storage Prohibition (71.4.B.3)
- 1. Rule 74.6, Surface Cleaning and Degreasing Wipe Cleaning (74.6)
- m. Rule 74.10, Fugitive Emissions Oilfields (74.10)
- n. Rule 74.22, Natural Gas-Fired, Fan-Type Central Furnaces (74.22)

### 10. General Requirements for Short-Term Activities (Attachments)

- a. Rule 74.1, Abrasive Blasting (74.1)
- b. Rule 74.2, Architectural Coatings (74.2)
- c. 40 CFR Part 61 Subpart M Asbestos NESHAPS (40CFR61.M)

#### 11. General Permit Conditions

- a. Part 70 Permit General Conditions
- b. Permit to Operate General Conditions

### 12. Miscellaneous Federal Program Conditions

- a. 40 CFR Part 55 OCS Requirements (40CFR55)
- b. 40 CFR Part 68 Accidental Release Prevention and Risk Management Plans (40CFR68)
- c. 40 CFR Part 82 Protection of Stratospheric Ozone (40CFR82)

### 13. Part 70 Permit Application Package

Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

### 2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

### **Purpose**

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions".

### **Equipment Description**

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

### **Applicable Requirements**

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 7, "Specific Applicable Requirements", that contains the associated permit conditions. For example, code key "1" under Rule 71.1 is associated with Attachment 71.1N1 in Section No. 7.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also corresponds to the permit attachment in Section No. 8, "Permit Specific Conditions", that contains the permit specific requirements.

M:\TITLEV\ATTACH\PERMIT2.DOC

## VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493

### Permitted Equipment and Applicable Requirements

|   |   | Ι. | Ι |         |
|---|---|----|---|---------|
| M:\TITLEV\LOTUS\AR_1493P  | 7 | 7  | 7 | A       |
| 23-Apr-98   | 1 | 1  | 4 | D       |
|   |   |    | • | D.      |
| Equipment   | 1 | 4  | 9 |         |
|   |   |    |   | R       |
|   |   |    |   | Е       |
|   |   |    |   | Q.      |
| Chevron Platform Grace  |   |    |   |         |
| 1 - 321 BBL PWT (Waste Water Pump Tank) (T-24) VR                 | 1 |    |   |         |
| 1 - 300 BBL COST ("Dirty" Oil) (T-3A) VR                          | 1 |    |   | PC1     |
| 1 - 300 BBL COST ("Dirty" Oil) (T-3B) VR                          | 1 |    |   | PC1     |
| 1 - 300 BBL Oil Pipeline Relief Tank (T-11) VR                    | 1 |    |   |         |
| 1 - 200 BBL COST (Production Surge Vessel) (V-8) VR               | 1 |    |   | PC1     |
| 1 - 100 BBL Spare COST (T-10) VR                                  | 1 |    |   |         |
| 1 - 132 BBL Sediment Separator Tank (T-4) VR                      | 1 |    |   |         |
| 1 - 108 BBL Floculation Cell (T-6) VR                             | 1 |    |   |         |
| 1 - 80 BBL PWT (Waste Water Sump Tank) (T-12) VR                  | 1 |    |   |         |
| 1 - 50 BBL Production Drain Tank (T-9) VR                         | 1 |    |   |         |
| 1 - 180 Sqft Waste Water Sump (T-13) Exempt < 5 mg/l              |   | 3  |   |         |
| 1 - 33.57 Sqft Waste Water CPI Sump (T-2) Exempt < 5 mg/l         |   | 3  |   |         |
| 1 - 773 BHP NG Rich Burn Waukesha Engine (G-03) NSCR              |   |    | 3 | PC1, PC |
| 1 - 3600 BHP (2.8 MW) NG/FO Solar Centaur Turbine (G-1B)**        |   |    |   | PC1, PC |
| 1 - 3600 BHP (2.8 MW) NG/FO Solar Centaur Turbine (G-1C)**        |   |    |   | PC1, PC |
| 1 - 600 BHP Caterpillar Diesel Back-up Generator Engine (G-02)    |   |    | 8 | PC1, PC |
| 1 - 300 BHP Diesel Engine No. 1 (GM Model 8V92) (North Crane)     |   |    | 9 | PC1, PC |
| 1 - 300 BHP Diesel Engine No. 2 (GM Model 8V92) (South Crane)     |   |    | 9 | PC1, PC |
| 1 - 233 BHP Diesel Engine (Detroit Model 8V71T) (Turbine Starter) |   |    | 8 | PC1     |
| 1 - 1006.30 MMBTU/Hr Flare (High Pressure)                        |   |    |   | PC2     |
| 1 - 218.8 MMBTU/Hr Flare (Low Pressure)                           |   |    |   | PC2     |
| 1 - 595 BBL Liquor Oxidizer Tank UNC (T-21A)**                    |   |    |   | PC4     |
| 1 - 595 BBL Liquor Oxidizer Tanks UNC (T-21B) **                  |   |    |   | PC4     |
| 1 - 198 BBL Slurry Tank UNC (T-23) **                             |   |    |   | PC4     |
| 1 - 21 BBL Stretford Sump Tank UNC (T-25) **                      |   |    |   | PC4     |
|   |   |    |   | PC4     |

## VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493 Permitted Equipment and Applicable Requirements

### **Permitted Equipment and Applicable Requirements** $M:\ \ TITLEV\setminus LOTUS\setminus AR\_1493P$ Α 1 4 D 23-Apr-98 D. Equipment 4 R Ε Q. **Boom Boat (Monarch)** 1 - 200 BHP Diesel Main Engine (Volvo Penta, Model AQAD41A) PC1 **Boom Boat (Boomer)** 1 - 200 BHP Diesel Main Engine (Volvo Penta, Model AQAD41A) PC1 1 - 200 BHP Diesel Main Engine (Volvo Penta, Model AQAD41A) PC1 **Crew Boat** 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI) PC1 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI) PC1 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI) PC1 PC1 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI) 1 - 109 BHP Diesel Auxiliary Engine (GMC, 3-71C) PC1 1 - 109 BHP Diesel Auxiliary Engine (GMC, 3-71C) PC1 **Work Boat** 1 - 1125 BHP Diesel Main Engine (CAT D399T/A) PC1 1 - 1125 BHP Diesel Main Engine (CAT D399T/A) PC1 PC1 1 - 174 BHP Diesel Generator Engine (CAT 3306 DIT) 1 - 174 BHP Diesel Generator Engine (CAT 3306 DIT) PC1 1 - 325 BHP Diesel Bow Thruster Engine (CAT 3406 DIT) PC1 For Use Throughout Leases 16 - Oil Wells (11 active wells) PC1 Wipe Cleaning Operation PC1 \*\* - Out of Service

### TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

<u>Wash Tank</u> A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

<u>COST</u> A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

<u>PWT</u> A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

<u>LACT Tank</u> A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is <u>not</u> by definition a LACT tank, but is a COST.

<u>Gauge or Test Tank</u> A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

<u>Condensate Tank</u> A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

 $\underline{VR}$  A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

<u>UNC</u> Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NOx controls are labeled UNC.

<u>Loading Facility</u> A crude oil loading rack or loading valve used for the transfer of crude oil from a storage tank or group of tanks to a delivery vessel.

<u>BL</u> A crude oil loading facility that is equipped with bottom loading capabilities.

<u>SF</u> A crude oil loading facility that is equipped with submerged fill loading capabilities.

<u>NG</u> Indicates that the equipment is permitted to be fired on natural gas only.

<u>NG/FO</u> Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

<u>BHP</u> The output of an internal combustion engine as measured in brake horsepower.

<u>MMBTU/Hr</u> The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

<u>Sump</u> Device used for separation, generally in constant use.

<u>Pit</u> Device used to receive emergency or intermittent flows.

<u>Cover</u> Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

<u>EXEMPT</u> A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

<u>Lo-NOx</u> Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

<u>Rich Burn or Lean Burn</u> A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

<u>NSCR</u> Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

<u>PSC</u> Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

<u>SCR</u> Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 72.23 compliance requirements.

### TITLE V APPLICABLE REQUIREMENT CODE KEY

### Rule 70, "Storage and Transfer of Gasoline"

(District: 5/13/97 SIP: 5/4/95)

- 1. Storage tank shall be equipped with a submerged fill pipe only, tank is exempt from Phase I and Phase II vapor recovery since gasoline throughput has not exceeded 6,000 gallons per year. (70.B.1 and 70.F.3) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
- 2. Storage tank shall be equipped with a submerged fill pipe and Phase I vapor recovery, tank is exempt from Phase II vapor recovery since gasoline throughput has not exceeded 24,000 gallons per year (70.B.1, 70.B.2, and 70.F.4) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15)
- 3. Storage tank shall be equipped with a submerged fill pipe, Phase I vapor recovery, and Phase II vapor recovery. (70.B.1, 70.B.2, and 70.B.9) Tank vent shall be equipped with a pressure vacuum relief valve. (70.B.6) Requirement for signage in dispensing area. (70.B.15) Operation and maintenance requirements for Phase II vapor recovery components. (70.E)

### Rule 71.1, "Crude Oil Production and Separation"

(District: 6/6/92 SIP: 6/6/92)

- 1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
- 2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 90% by weight (71.1.B.1.b)
- 3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
- 4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
- 5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
- 6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements.

### Rule 71.3, "Transfer of Reactive Organic Compound Liquids"

(District: 6/16/92 SIP: 6/16/92)

- 1. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery based on low throughput. (71.3.B.1) Requirement for leak-free equipment. (71.3.B.3)
- 2. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system with automatic primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
- 3. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system with automatic primary and secondary overfill protection. (71.3.B.2.a.2 and 71.3.B.2.b.1) Requirement for leak-free equipment. (71.3.B.3)
- 4. Requirement for bottom loaded vapor recovery system which connects to a gas pipeline recovery and distribution system and APCO-approved alternative primary and secondary overfill protection. (71.3.B.2.a.1 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
- 5. Requirement for bottom loaded vapor recovery system which connects to a 90% vapor disposal system and APCO-approved alternative primary and secondary overfill protection (71.3.B.2.a.2 and 71.3.B.2.b.2) Requirement for leak-free equipment. (71.3.B.3)
- 6. Exemption from Rule 71.3 because the crude oil has a modified Reid vapor pressure of less than 0.5 psia. (71.3.E.1)
- 7. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank exempt from the vapor recovery requirements of Rule 71.1. (71.3.B.1 and 71.3.E.2) Requirement for leak-free equipment. (71.3.B.3)
- 8. Requirement for submerged fill pipe or bottom loading and exemption from vapor recovery when transfer is from a tank that is located more than 1200 feet from a loading facility constructed prior to July 1, 1990. (71.3.B.1 and 71.3.E.3) Requirement for leak-free equipment. (71.3.B.3)
- 9. Exemption from Rule 71.3 because the crude oil is being transferred into a vacuum truck, and not into a ROC liquid delivery vessel as defined in Rule 71.B.26. (71.B.26)

### Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"

(District: 6/8/93 SIP: 6/8/93)

- 1. Second and third stage sumps, pits, and ponds shall have an impermeable cover (71.4.B.2)
- 2. Exemption from cover requirement for emergency pits (71.4.C.1.b)
- 3. Exemption from cover requirement for sumps, pits, or pond if the ROC content of

- the liquid at the point of entry is less than 5 milligrams per liter (71.4.C.1.c)
- 4. Exemption from cover requirement for sumps, pits, or pond when a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.4.C.1.d)

### Rule 71.5, "Glycol Dehydrators"

(District: 12/13/94 SIP: 12/13/94)

- 1. Requirement to have a condenser or separator system which directs vapors to a fuel gas or sales gas system. (71.5.B.1.a.1) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
- 2. Requirement to have a condenser or separator system which directs vapors to a flare, incinerator, thermal oxidizer or reboiler. (71.5.B.1.a.2) Operation requirements for flare or incinerator. (71.5.B.1.b) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
- 3. Requirement to have a condenser or separator system which directs vapors to another 95% control system. (71.5.B.1.a.3) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
- 4. Requirement to have any other control system with a 95% control efficiency or which meets an emission limit of 1.7 lb ROC per MMSCF of gas dehydrated. (71.5.B.1.c) Requirement to prevent hydrocarbon liquid evaporation and control system leaks. (71.5.B.2 and 71.5.B.3)
- 5. Exemption from the control requirements of Rule 71.5 for unit that is operated less than 200 hours per year. (71.5.C)

### Rule 74.9, "Stationary Internal Combustion Engines"

(District: 12/21/93 SIP: 12/21/93)

- 1. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas rich burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
- 2. Pre-January 1, 2002 emission limits and post-January 1, 2002 emission limits for natural gas lean burn engines with existing emission controls installed after September 5, 1989. (74.9.B.1 or 74.9.B.2, and 74.9.B.3)
- 3. Post-January 1, 1997 emission limits for natural gas rich burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2)
- 4. Post-January 1, 1997 emission limits for natural gas lean burn engines with emission controls installed before September 5, 1989; or installed after March 5, 1992. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
- 5. Post-January 1, 1997 emission limits for diesel engines. (74.9.B.1 or 74.9.B.2) Post-January 1, 1997 emission limit for ammonia, if applicable. (74.9.B.5)
- 6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar

- year (74.9.D.2)
- 7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)
- 8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
- 9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)

### Rule 74.15, "Boilers, Steam Generators and Process Heaters"

(District: 11/8/94 SIP: 11/8/94)

- 1. NOx and CO emission limits for units with an annual heat input rate greater than or equal to 9,000 MMBTU per calendar year (74.15.B.1)
- 2. Tuning and fuel metering requirements for units with an annual heat input rate of less than 9,000 MMBTU per calendar year. (74.15.B.2 and 74.15.D.1)

### Rule 74.15.1, "Boilers, Steam Generators and Process Heaters"

(District: 6/13/95 SIP: 5/11/93)

- 1. NOx and CO emission limits for units with an annual heat input greater than or equal to 1,800 MMBTU. (74.15.1.B.1)
- 2. Tuning and fuel metering requirements for units with an annual heat input rate of greater than or equal to 300 MMBTU and less than 1,800 MMBTU. (74.15.1.B.2 and 74.15.1.D.1)
- 3. Exemption from tuning requirements for units with an annual heat input rate less than 300 MMBTU and requirement for metering. (74.15.1.B.2 and 74.15.1.D.1)
- 4. Equipment is currently shut-down and not operating. Upon operation will install fuel meter (74.15.1.D.1). Based on annual heat input will perform tuning (74.15.1.B.2) or will comply with NOx and CO emission limits (74.15.1.B.1).

### Rule 74.23, "Stationary Gas Turbines"

(District: 10/10/95 SIP: 10/10/95)

- 1. NOx and NH3 emission limit for turbines rated at 0.3 MW to less than 2.9 MW (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
- 2. NOx and NH3 emission limit for turbines rated at 2.9 MW to less than 10.0 MW. (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
- 3. NOx and NH3 emission limit for turbines rated at 10.0 MW and higher, with SCR, and operated less than 4,000 hr/yr (74.23.B.1 and 74.23.B.4) Requirement to monitor operating parameters. (74.23.B.2.a and b)
- 4. NOx and NH3 emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, with SCR, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, and 74.23.B.4)

- 5. NOx emission limit for turbines rated at 10.0 MW and higher, without SCR, and operated less than 4,000 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
- 6. NOx emission limit and CEMS requirement for turbines rated at 10.0 MW and higher, without SCR, and operated more than 4,000 hr/yr (74.23.B.1 and 74.23.B.2)
- 7. NOx emission limit for turbines rated at 4.0 MW and higher, operated less than 877 hr/yr (74.23.B.1) Requirement to monitor operating parameters. (74.23.B.2.a and b)
- 8. Exemption from the requirements of 74.23.B, for turbines operated less than 200 hrs per calendar year (74.23.C.1.c)
- 9. Exemption from the requirements of 74.23.B, for emergency standby units operated during either an emergency or maintenance operation. (74.23.C.1.d)
- 10. Pre-April 30, 2001 NOx emission limit and CEMS requirement and post-April 30, 2001 NOx emission limit and CEMS requirement for turbines rated at over 20 MW, equipped with water injection only where exhaust gases are used to dry paper, and operated more than 4,000 hr/yr (74.23.B.1, 74.23.B.2, 74.23.B.5, and 74.23.I.3)

 $M: \ \ TITLEV \setminus ATTACH \setminus PERMIT2.DOC$ 

#### 3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

### <u>Purpose</u>

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 8, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

### **Equipment Description**

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

### **Throughput Permit Limit**

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput column are left blank.

### Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

The "Calculation Procedure" column is reserved for future use. Emission calculations for the emissions units in this table are available in the District's existing permit files for this stationary source.

### Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year Days/Yr: days per year FO: fuel oil or diesel fuel Gal/Yr: gallons per year Hrs/Day: hours per day Hrs/Yr: hours per year

Lbs ROC/Yr: pounds of reactive organic compounds per year

MBBL/Yr: thousands of barrels per year MGal/Yr: thousands of gallons per year

MMBTU/Yr: million British Thermal Units of heat input per year MMCF/Yr: million standard cubic feet of natural gas per year

MMGal/Yr: million gallons per year

NG: natural gas TPY: tons per year

### VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493

### **Permitted Throughput/Consumption Limits**

|   | 1                             |  |                           | 1                     |
|---|-------------------------------|--|---------------------------|-----------------------|
| M:\TITLEV\LOTUS\TP_1493P  27-Apr-98  Equipment                    | Throughput<br>Permit<br>Limit | District (D)/<br>Federal(F)<br>Enforceable | Calculation<br>Throughput | Calculation Procedure |
| Chevron Platform Grace  |                               |  |                           |                       |
| 1 - 321 BBL PWT (Waste Water Pump Tank) (T-24) VR                 |                               |  |                           |                       |
| 1 - 300 BBL COST ("Dirty" Oil) (T-3A) VR                          | 20 MBBL/Yr                    | F  | 20 MBBL/Yr                |                       |
| 1 - 300 BBL COST ("Dirty" Oil) (T-3B) VR                          | 20 MBBL/Yr                    | F  | 20 MBBL/Yr                |                       |
| 1 - 300 BBL Oil Pipeline Relief Tank (T-11) VR                    |                               |  |                           |                       |
| 1 - 200 BBL COST (Production Surge Vessel) (V-8) VR               | 3,960 MBBL/Yr                 | F  | 3,960 MBBL/Yr             |                       |
| 1 - 100 BBL Spare COST (T-10) VR                                  |                               |  |                           |                       |
| 1 - 132 BBL Sediment Separator Tank (T-4) VR                      |                               |  |                           |                       |
| 1 - 108 BBL Floculation Cell (T-6) VR                             |                               |  |                           |                       |
| 1 - 80 BBL PWT (Waste Water Sump Tank) (T-12) VR                  |                               |  |                           |                       |
| 1 - 50 BBL Production Drain Tank (T-9) VR                         |                               |  |                           |                       |
| 1 - 180 Sqft Waste Water Sump (T-13) Exempt < 5 mg/l              |                               |  |                           |                       |
| 1 - 33.57 Sqft Waste Water CPI Sump (T-2) Exempt < 5 mg/l         |                               |  |                           |                       |
| 1 - 773 BHP NG Rich Burn Waukesha Engine (G-03) NSCR              | 51.10 MMCF/Yr NG              | F  | 51.1 MMCF/Yr NG           |                       |
| 1 - 3600 BHP (2.8 MW) NG/FO Solar Centaur Turbine (G-1B)          | 286.88 MMCF/Yr NG             | F  | 286.88 MMCF/Yr NG         |                       |
|   | & 277,444 Gal/Yr FO           | F  | & 277,444 Gal/Yr FO       |                       |
| 1 - 3600 BHP (2.8 MW) NG/FO Solar Centaur Turbine (G-1C)          | *                             | F  | *                         |                       |
| 1 - 600 BHP Caterpillar Diesel Back-up Generator Engine (G-02)    | + & 55.9 MGal/Yr              | F  | 55.9 MGal/Yr              |                       |
| 1 - 300 BHP Diesel Engine No. 1 (GM Model 8V92) (North Crane)     | 13,344 Gal/Yr ++              | F  | 13,344 Gal/Yr ++          |                       |
| 1 - 300 BHP Diesel Engine No. 2 (GM Model 8V92) (South Crane)     | *                             | F  | *                         |                       |
| 1 - 233 BHP Diesel Engine (Detroit Model 8V71T) (Turbine Starter) | 7,315 Gal/Yr                  | F  | 7,315 Gal/Yr              |                       |
| 1 - 1006.30 MMBTU/Hr Flare (High Pressure)                        | 7.05 MMCF/Yr                  | F  | 7.05 MMCF/Yr              |                       |
| 1 - 218.8 MMBTU/Hr Flare (Low Pressure)                           | 0.14 MMCF/Yr                  | F  | 0.14 MMCF/Yr              |                       |
| 1 - 595 BBL Liquor Oxidizer Tank UNC (T-21A)**                    |                               |  |                           |                       |
| 1 - 595 BBL Liquor Oxidizer Tanks UNC (T-21B) **                  |                               |  |                           |                       |
| 1 - 198 BBL Slurry Tank UNC (T-23) **                             |                               |  |                           |                       |
| 1 - 21 BBL Stretford Sump Tank UNC (T-25) **                      |                               |  |                           |                       |
| 1 - 14 BBL Chemical Makeup Tank UNC (T-22) **                     |                               |  |                           |                       |
|   |                               |  |                           |                       |
|   |                               |  |                           |                       |

# VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493 Permitted Throughput/Consumption Limits

| M:\TITLEV\LOTUS\TP_1493P  27-Apr-  Equipment               | Throughput<br>Permit<br>Limit | District (D)/<br>Federal(F)<br>Enforceable | Calculation<br>Throughput | Calculation<br>Procedure |
|--|-------------------------------|--|---------------------------|--------------------------|
| Boom Boat (Monarch)  |                               |  |                           |                          |
| 1 - 200 BHP Diesel Main Engine (VolvoPenta, Model AQAD41A) | 936 Gal/Yr                    | F  | 936 Gal/Yr                |                          |
| Boom Boat (Boomer)   |                               |  |                           |                          |
| 1 - 200 BHP Diesel Main Engine (VolvoPenta, Model AQAD41A) | 469 Gal/Yr                    | F  | 469 Gal/Yr                |                          |
| 1 - 200 BHP Diesel Main Engine (VolvoPenta, Model AQAD41A) | *                             | F  | *                         |                          |
| Crew Boat  |                               |  |                           |                          |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)              |                               |  | 53.1 MGal/Yr              |                          |
| RO   | C 1.90 TPY                    | F  |                           |                          |
| No   | Ox 32.11 TPY                  | F  |                           |                          |
| F  | M 1.92 TPY                    | F  |                           |                          |
| Se   | 0.42 TPY                      | F  |                           |                          |
|  | O 5.84 TPY                    | F  |                           |                          |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)              | *                             | F  | *                         |                          |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)              | *                             | F  | *                         |                          |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)              | *                             | F  | **                        |                          |
| 1 - 109 BHP Diesel Auxiliary Engine (GMC, 3-71C)           | *                             | F  | *                         |                          |
| 1 - 109 BHP Diesel Auxiliary Engine (GMC, 3-71C)           | *                             | F  | *                         |                          |
| Work Boat  |                               |  |                           |                          |
| 1 - 1125 BHP Diesel Main Engine (CAT D399T/A)              | *                             | F  | 61.4 MGal/Yr              |                          |
| 1 - 1125 BHP Diesel Main Engine (CAT D399T/A)              | *                             | F  | *                         |                          |
| 1 - 174 BHP Diesel Generator Engine (CAT 3306 DIT)         | *                             | F  | *                         |                          |
| 1 - 174 BHP Diesel Generator Engine (CAT 3306 DIT)         | *                             | F  | ajc.                      |                          |
| 1 - 325 BHP Diesel Bow Thruster Engine (CAT 3406 DIT)      | *                             | F  | aje                       |                          |
|  |                               |  |                           |                          |

# VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493 Permitted Throughput/Consumption Limits

| M:\TITLEV\LOTUS\TP_1493P  27-Apr-98  Equipment   | Throughput<br>Permit<br>Limit | District (D)/<br>Federal(F)<br>Enforceable | Calculation<br>Throughput | Calculation<br>Procedure |
|--|-------------------------------|--|---------------------------|--------------------------|
| For Use Throughout Leases  |                               |  |                           |                          |
| 16 - Oil Wells (11 active wells)   |                               |  |                           |                          |
| * - Included in Limit Above  + - Turbines and Back-up Generator Have a Combined Diesel Limit of 277,440 Gal/Yr with a Not to Exceed Limit of 55,900 Gal/Yr for the Back-up Generator  ++ - Crane Engine Limit w/ Active Wells is 7,344 Gal/Yr  ** - Out of Service  *** - Calculation Throughput is Based on the Types of Solvents, Their ROC Content, and Quantities Presented in the Table Below | 4.45 TPY                      | F  | ***                       |                          |

| ** |                 | Solvent  |           |
|----|-----------------|----------|-----------|
|    |                 | Density  | Quantity  |
|    | Type of Solvent | (lb/gal) | (Gallons) |
|    |                 |          |           |
|    | Chemco          | 6.3      | 1200      |
|    | Kerosene        | 6.7      | 200       |
|    |                 |          |           |

### 4. PERMITTED EMISSIONS TABLE

### **Purpose**

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

### **Enforceability of Permitted Emissions**

The permitted emissions in the units of tons per year and pounds per hour listed in the permitted emissions table are not directly enforceable as permit conditions. Other permit conditions listed in the permit, however, are designed to limit the emissions from this stationary source to the limits in the table.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

### **Equipment Description**

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

### Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

### **Hazardous Air Pollutants**

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the facility's AB-2588, Air Toxics "Hot Spots", Report referenced at the bottom of the "Permitted Emissions Table". For Outer Continental Source (OCS) sources, not subject to AB-2588, HAP emissions information is referenced in the permit application and is maintained by the stationary source.

M:\TITLEV\ATTACH\PERMIT4.DOC

## VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493

### Permitted Emissions

| M:\TITLEV\LOTUS\PE_1493P 27-Apr-98                                | TONS PER YEAR |       |      |      | POUNDS PER HOUR |        |        |      |        |       |
|---|---------------|-------|------|------|-----------------|--------|--------|------|--------|-------|
| Equipment   | ROC           | NOx   | PM   | SOx  | СО              | ROC    | NOx    | PM   | SOx    | CO    |
| Chevron Platform Grace  |               |       |      |      |                 |        |        |      |        |       |
| 1 - 321 BBL PWT (Waste Water Pump Tank) (T-24) VR                 | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 300 BBL COST ("Dirty" Oil) (T-3A) VR                          | 0.03          |       |      |      |                 | 0.01   |        |      |        |       |
| 1 - 300 BBL COST ("Dirty" Oil) (T-3B) VR                          | 0.03          |       |      |      |                 | 0.01   |        |      |        |       |
| 1 - 300 BBL Oil Pipeline Relief Tank (T-11) VR                    | 0.01          |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 200 BBL COST (Production Surge Vessel) (V-8) VR               | 2.34          |       |      |      |                 | 0.53   |        |      |        |       |
| 1 - 100 BBL Spare COST (T-10) VR                                  | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 132 BBL Sediment Separator Tank (T-4) VR                      | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 108 BBL Floculation Cell (T-6) VR                             | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 80 BBL PWT (Waste Water Sump Tank) (T-12) VR                  | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 50 BBL Production Drain Tank (T-9) VR                         | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 180 Sqft Waste Water Sump (T-13) Exempt < 5 mg/l              | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 33.57 Sqft Waste Water CPI Sump (T-2) Exempt < 5 mg/l         | < 0.01        |       |      |      |                 | < 0.01 |        |      |        |       |
| 1 - 773 BHP NG Rich Burn Waukesha Engine (G-03) NSCR              | 1.72          | 0.89  | 0.26 | 0.02 | 96.15           | 0.39   | 0.20   | 0.06 | 0.00   | 21.97 |
| 1 - 3600 BHP (2.8 MW) NG/FO Solar Centaur Turbine (G-1B)          | 1.40          | 28.21 | 3.66 | 1.06 | 17.51           | 1.72   | 27.25  | 4.14 | 5.44   | 11.88 |
| 1 - 3600 BHP (2.8 MW) NG/FO Solar Centaur Turbine (G-1C)          | *             | *     | *    | *    | *               | *      | *      | *    | *      | *     |
| 1 - 600 BHP Caterpillar Diesel Back-up Generator Engine (G-02)    | X             | X     | X    | X    | X               | X      | X      | X    | X      | X     |
| 1 - 300 BHP Diesel Engine No. 1 (GM Model 8V92) (North<br>Crane)  | 0.22          | 3.12  | 0.22 | 0.05 | 0.68            | 1.41   | 19.96  | 1.43 | 0.32   | 4.34  |
| 1 - 300 BHP Diesel Engine No. 2 (GM Model 8V92) (South Crane)     | *             | *     | *    | *    | *               | *      | *      | *    | *      | *     |
| 1 - 233 BHP Diesel Engine (Detroit Model 8V71T) (Turbine Starter) | 0.12          | 1.72  | 0.12 | 0.03 | 0.37            | 0.55   | 7.75   | 0.55 | 0.12   | 1.69  |
| 1 - 1006.30 MMBTU/Hr Flare (High Pressure)                        | 0.00          | 1.94  | 0.01 | 1.17 | 0.14            | 1.34   | 527.11 | 2.88 | 316.99 | 38.34 |
| 1 - 218.8 MMBTU/Hr Flare (Low Pressure)                           | 0.00          | 0.04  | 0.00 | 0.02 | 0.00            | 0.29   | 114.61 | 0.63 | 68.93  | 8.34  |
| 1 - 595 BBL Liquor Oxidizer Tank UNC (T-21A)**                    |               |       |      |      |                 |        |        |      |        |       |
| 1 - 595 BBL Liquor Oxidizer Tanks UNC (T-21B) **                  |               |       |      |      |                 |        |        |      |        |       |
| 1 - 198 BBL Slurry Tank UNC (T-23) **                             |               |       |      |      |                 |        |        |      |        |       |
| 1 - 21 BBL Stretford Sump Tank UNC (T-25) **                      |               |       |      |      |                 |        |        |      |        |       |

# VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493 Permitted Emissions

|  | 1    |       |         |      |      | 1    |            |        |        |       |
|--|------|-------|---------|------|------|------|------------|--------|--------|-------|
| M:\TITLEV\LOTUS\PE_1493P<br>27-Apr-98  |      | TONS  | S PER Y | /EAR |      |      | POU        | NDS PE | R HOUR |       |
| Equipment  | ROC  | NOx   | PM      | SOx  | СО   | ROC  | NOx        | PM     | SOx    | СО    |
| 1 - 14 BBL Chemical Makeup Tank UNC (T-22) **  |      |       |         |      |      |      |            |        |        |       |
| Boom Boat (Monarch)  |      |       |         |      |      |      |            |        |        |       |
| 1 - 200 BHP Diesel Main Engine (Volvo Penta, Model AQAD41A)                                  | 0.02 | 0.22  | 0.02    | 0.00 | 0.05 | 0.47 | 6.65       | 0.48   | 0.11   | 1.45  |
| Boom Boat (Boomer)   |      |       |         |      |      |      |            |        |        |       |
| 1 - 200 BHP Diesel Main Engine (Volvo Penta, Model AQAD41A)                                  | 0.01 | 0.11  | 0.01    | 0.00 | 0.02 | 0.94 | 13.31      | 0.95   | 0.21   | 2.89  |
| 1 - 200 BHP Diesel Main Engine (Volvo Penta, Model AQAD41A)                                  | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| Crew Boat  |      |       |         |      |      |      |            |        |        |       |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)  | 0.88 | 14.89 | 0.89    | 0.20 | 2.71 | 5.31 | 89.84      | 5.36   | 1.20   | 16.33 |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)  | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)  | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| 1 - 510 BHP Diesel Main Engine (GMC, 12V71TI)  | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| 1 - 109 BHP Diesel Auxiliary Engine (GMC, 3-71C)   | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| 1 - 109 BHP Diesel Auxiliary Engine (GMC, 3-71C)  Work Boat                                  | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| 1 - 1125 BHP Diesel Main Engine (CAT D399T/A)  | 1.02 | 17.22 | 1.03    | 0.23 | 3.13 | 5.64 | 95.36      | 5.69   | 1.27   | 17.34 |
| 1 - 1125 BHP Diesel Main Engine (CAT D399T/A)  1 - 1125 BHP Diesel Main Engine (CAT D399T/A) | *    | *     | *       | *    | *    | *    | 93.30<br>* | *      | *      | *     |
| 1 - 174 BHP Diesel Generator Engine (CAT 3306 DIT)   | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| 1 - 174 BHP Diesel Generator Engine (CAT 3306 DIT)   | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| 1 - 325 BHP Diesel Bow Thruster Engine (CAT 3406 DIT)  | *    | *     | *       | *    | *    | *    | *          | *      | *      | *     |
| For Use Throughout Leases  |      |       |         |      |      |      |            |        |        |       |

# VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 1493 Permitted Emissions

| M:\TITLEV\LOTUS\PE_1493P 27-Apr-98  |       | TONS  | S PER Y | /EAR |        | POUNDS PER HOUR |        |       |        |        |
|---|-------|-------|---------|------|--------|-----------------|--------|-------|--------|--------|
| Equipment   | ROC   | NOx   | PM      | SOx  | СО     | ROC             | NOx    | PM    | SOx    | СО     |
| 16 - Oil Wells (11 active wells)  | 5.84  |       |         |      |        | 1.33            |        |       |        |        |
| Solvent Wipe Cleaning Operation   | 4.45  |       |         |      |        | 1.01            |        |       |        |        |
| * - Included in Emissions Above  ** - Out of Service  X - Included in Turbine Emissions Above as Turbines are Wors  Case. | t     |       |         |      |        |                 |        |       |        |        |
| Total Permitted Emissions   | 18.09 | 68.36 | 6.22    | 2.78 | 120.76 | 20.95           | 902.04 | 22.17 | 394.59 | 124.57 |

HAP Emissions Ref.: OCS HAP Emission Estimation Techniques and Calculations are

Maintained at the Facility.

#### 5. OIL WELL LIST

This permit authorizes the operation of a maximum number of wells for the production of oil or natural gas. This section of the permit contains a list of the wells currently authorized to be operated. When changes to the list are made, the permit holder is required to maintain a copy of the revised oil well list at the facility and to submit a copy of the revised oil well list to the District.

A revision to this permit is required prior to adding a well that is newly drilled to the oil well list or prior to increasing the number of wells on the oil well list. Other revisions to the oil well list will not require a revision to this permit.

Section No. 8, "Permit Specific Conditions", includes a condition that limits the maximum number of producing wells at this stationary source. If applicable, Section No. 8 also includes a condition that requires best available control technology (BACT) on specific wells that were subject to Rule 26, "New Source Review".

M:\TITLEV\ATTACH\PERMIT5.DOC

### Ventura County Air Pollution Control District

### **OIL WELL LIST**

Permit to Operate No. 1493

The following oil wells are on permit:

### Slot Numbers

A-2

A-3

A-10

A-15

A-21

A-23

A-25

A-27 short

A-27 long

A-29

A-30

M:\TITLEV\PERMIT\PO1493\WELL.DOC

### 6. EXEMPT EQUIPMENT LIST

Under the District's Title V Federal Operating Permit Program, insignificant activities have been defined to be equivalent to the operations, equipment, or emissions units that are exempt from permit as detailed in APCD Rule 23, "Exemptions From Permit". APCD Rule 33.2.A.11 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to APCD Rule 23 based on size or production rate.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in VCAPCD Rule 23, "Exemptions From Permit".

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in APCD Rule 33.2.A.11, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 9 of this permit may apply to these insignificant activities.

 $M: \ \ TITLEV \ \ ATTACH \ \ PERMIT6.DOC$ 

## Ventura County Air Pollution Control District INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)

Form TVAF50/05-21-96

List all insignificant activities (exempt equipment) which are exempted because of size or production rate.

| INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS) | BASIS FOR EXEMPTION (Size/Production Rate)   | RULE 23 CITATION |
|--|--|------------------|
| Fire Water Pump                                  | Engine used for emergency pumping of water for fire protection, and engine maintenance operation is < 50 hr/yr | 23.D.7           |
|  |  |                  |
|  |  |                  |
|  |  |                  |
|  |  |                  |
|  |  |                  |
|  |  |                  |
|  |  |                  |
|  |  |                  |

### 7. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

 $M: \ \ TITLEV \ \ ATTACH \ \ PERMIT7.DOC$ 

### Ventura County Air Pollution Control District Rule 71.1.B.1.a Applicable Requirements Tanks Equipped with Vapor Recovery

Rule 71.1, "Crude Oil Production and Separation" Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

### **Applicability:**

This attachment applies to tanks at this stationary source equipped with a vapor recovery system which directs all vapors to a fuel gas system, a sales gas system, or to a flare. Specifically, this attachment applies to all storage tanks in a tank battery including wash tanks, produced water tanks, and wastewater separators, that are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

### **Conditions:**

1. Pursuant to Rule 71.1.B.1.a, all tanks shall be equipped with a properly installed, maintained and operated vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system, a sales gas system, or to a flare that combusts reactive organic compounds.

- 2. Pursuant to Rule 71.1.D.2, the vapor recovery provisions of Rule 71.1.B.1.a shall not apply during maintenance operations on vapor recovery systems or tank batteries, including wash tanks, produced water tanks and wastewater separators, if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation and if the maintenance operation will take no more than 24 hours to complete.
- 3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".
- 4. On a quarterly basis, permittee shall monitor the storage tank vapor recovery system to ensure that compliance with Rule 71.1.B.1.a is being maintained. This shall include an inspection of the following components, as applicable, for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare. Permittee shall keep dated records of the quarterly inspections and tank maintenance activities. These records shall be maintained at the facility and submitted to the District upon request.
- 5. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rule 71.1.B.1.a. This annual compliance certification shall include verifying that the tanks are equipped with a vapor recovery system.

M:\TTTLEV\ATTACH\711N1

### Ventura County Air Pollution Control District Rule 71.4.C.1.c Applicable Requirements Sumps, Pits, and Ponds Without Covers Low ROC Content Exemption

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars" Adopted 6/8/93, Federally-Enforceable

### **Applicability:**

This attachment applies to second or third stage sumps, pits, and ponds at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored and where the ROC (reactive organic compound) content of the liquid entering the sump, pit, or pond is less than 5 milligrams per liter. Pursuant to Rule 71.4.C.1.c, the provisions of Rule 71.4 do not apply to any sump, pit, or pond if the ROC content of the liquid entering the sump, pit, or pond is less than 5 milligrams per liter.

A sump, pit, or pond is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand or other material in petroleum production operations". A pit is further defined as "used to receive intermittent flows of petroleum material or crude oil. Neither a sample box of less than two (2) square feet in horizontal surface area nor a containment berm shall be considered a pit". A pond is further defined as "used to contain produced water from petroleum production processes for disposal or re-use. Ponds are not used for oil/water separation or evaporation".

### **Conditions:**

- 1. Pursuant to Rule 71.4.C.1.c, the ROC content of the liquid entering a sump, pit, or pond shall not exceed 5 milligrams per liter.
- 2. Permittee shall perform routine surveillance of the applicable sump, pit, or pond to ensure that compliance with Rule 71.4.C.1.c is being maintained. This routine surveillance shall include verifying that there is no change in the sump, pit, or pond contents or method of operation.
- 3. Under the authority of Rule 71.4.D.1, the District shall require any person claiming an exemption pursuant to Rule 71.4.C.1.c to validate the exemption for each sump, pit, or pond on an annual basis. Records of such validation shall be maintained at the facility, and shall be submitted to the District, in writing, with the

annual compliance certification, and shall include the results of an independent laboratory analysis.

Pursuant to Rule 71.4.F, the ROC content of crude oil or petroleum material in milligrams per liter shall be determined by EPA Method 8015. Samples will be analyzed using purge and trap (EPA Method 5030), and stock standards will be prepared from gasoline. Sampling shall occur at the entry point of the device.

M:\TTTLEV\ATTACH\714N3

# Ventura County Air Pollution Control District Rules 74.9.B.1 and 74.9.B.2 Applicable Requirements Stationary Natural Gas-Fired Rich-Burn Internal Combustion Engines Emission Limits After January 1, 1997

Rule 74.9, "Stationary Internal Combustion Engines" Adopted 12/21/93, Federally-Enforceable

### **Applicability:**

This attachment applies to stationary natural gas-fired rich-burn internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations". A rich-burn engine is defined by Rule 74.9 to be a two or four-stroke spark-ignited engine where the manufacturer's original recommended operating air/fuel ratio divided by the stoichiometric air/fuel ratio is less than or equal to 1.1.

More specifically, this attachment applies to all natural gas-fired rich-burn engines subject to Rule 74.9 except those with emission controls which were installed between September 5, 1989 and March 5, 1992 as detailed in the Increments of Progress of Rule 74.9.J.1.

### **Conditions:**

- 1. Pursuant to Rules 74.9.B.1 and 74.9.B.2, emissions from an applicable engine shall not exceed the following limits:
  - a. Oxides of Nitrogen (NOx expressed as NO<sub>2</sub>), Either:
    - 1. 25 ppmvd referenced at 15% oxygen; or
    - 2. A 96% reduction by volume, as measured concurrently across an emission control device.
  - b. Reactive Organic Compounds (ROC): 250 ppmvd referenced at 15% oxygen, expressed as methane
  - c. Carbon Monoxide (CO): 4500 ppmvd referenced at 15% oxygen

These limits may be adjusted for engine efficiency as detailed in Rule 74.9.B.4. Compliance with this condition shall be verified by an annual source test, conducted in accordance with Condition No. 2.

2. The permittee shall perform an annual source test on an applicable engine utilizing the following methods as detailed in Rule 74.9.G:

a. NOxb. COARB Method 100ARB Method 100

c. ROC EPA Method 25 or EPA Method 18

d. Oxygen Content ARB Method 100

e. Gaseous Fuel Heating Value ASTM Method D1826-77

Source test data point intervals for ARB Method 100 tests shall be no greater than 5 minutes and data points shall be averaged over 15 consecutive minutes. Prior to conducting an annual emissions test, the permittee shall notify the District Enforcement Section. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Enforcement Section within 45 days after the test.

3. Pursuant to Rule 74.9.C, the permittee shall maintain a District approved Engine Operator Inspection Plan. The plan shall include a specific emission inspection procedure to assure that the engine is operated in continual compliance with the provisions of Rule 74.9. The procedure shall include an inspection schedule. Inspections shall be conducted every quarter or after every 2,000 hours of engine operation. In no event shall the frequency of inspection be less than once per year. After an emission violation, as determined by compliance source test, the next three scheduled inspections shall include a screening analysis of the exhaust stream if a compliance source test is not required. The screening analysis shall include an examination of NOx and CO emissions. The screening analyses shall be performed using a portable analyzer approved in writing by the District Enforcement Section.

The plan shall be updated after any change in operation. For new engines or modifications to existing engines, the plan shall be submitted to and approved by the District prior to issuance of the Permit to Operate.

- 4. Pursuant to Rule 74.9.E, Recordkeeping Requirements, the operator shall maintain an inspection log for each engine containing, at a minimum, the following data:
  - a. Identification and location of each engine subject to Rule 74.9;
  - b. Date and results of each emission inspection and a summary of any emissions corrective maintenance action taken; and
  - c. Any additional information required in the Engine Operator Inspection Plan.

- 5. Pursuant to Rule 74.9.F, Reporting Requirements, the permittee shall provide the District a report that contains the following information:
  - a. Data specifying the actual annual usage, including but not limited to, fuel consumption or hours of operation;
  - b. Data for each engine including the engine manufacturer, model number, operator identification number and location of each engine, and a summary of the maintenance and testing reports required in the "Engine Operator Inspection Plan"; and
  - c. For each engine subject to Rule 74.9, an annual source test report.

The reports shall be submitted to the District Enforcement Section.

M:\TITLEV\ATTACH\749N3

# Ventura County Air Pollution Control District Rule 74.9.D.8 Applicable Requirements Stationary Diesel-Fired Internal Combustion Engines Permitted Capacity Factor of 15 Percent or Less

Rule 74.9, "Stationary Internal Combustion Engines" Adopted 12/21/93, Federally-Enforceable

### **Applicability:**

This attachment applies to stationary diesel-fired internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations".

As detailed in Rule 74.9.D.8, stationary diesel-fired internal combustion engines with a permitted capacity factor of 15 percent or less are exempt from all provisions of Rule 74.9. The "permitted capacity factor" is defined as the annual permitted fuel use divided by the manufacturer's specified maximum hourly fuel consumption times 8760 hours per year.

Specifically, this attachment applies to diesel engines that qualify for the 15 percent or less permitted capacity factor exemption.

- 1. Pursuant to Rule 74.9.D.8, the provisions of Rule 74.9 shall not apply to stationary internal combustion diesel engines with a permitted capacity factor of 15 percent or less.
- 2. Each engine shall have a permitted annual diesel fuel limit stipulated in the Permit to Operate which equates to no more than 15 percent annual capacity.
- 3. The operator maintain the following records and submit them to the District upon request:
  - a. Data for each engine verifying the manufacturer's specified maximum hourly fuel consumption;
  - b. Data specifying the actual annual usage (e.g., fuel consumption or operating hours); and

- c. Data for each engine including the engine manufacturer, model number, operator identification number, and location of each engine.
- 4. Permittee shall submit a report of the engine's hours of operation or fuel usage to the District Enforcement Section.

M:\TITLEV\ATTACH\749N8

# Ventura County Air Pollution Control District Rule 74.9.D.9 Applicable Requirements Stationary Diesel-Fired Internal Combustion Engines Used to Power Cranes and Welding Equipment

Rule 74.9, "Stationary Internal Combustion Engines" Adopted 12/21/93, Federally-Enforceable

### **Applicability:**

This attachment describes the requirements of APCD Rule 74.9, "Stationary Internal Combustion Engines", and applies to stationary diesel-fired internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations".

As detailed in Rule 74.9.D.9, stationary diesel-fired internal combustion engines used to power cranes and welding equipment are exempt from all provisions of Rule 74.9.

Specifically, this attachment applies to diesel engines that are exempt because they are used to power cranes and welding equipment.

### **Conditions:**

- 1. Pursuant to Rule 74.9.D.9, the provisions of Rule 74.9 shall not apply to stationary internal combustion diesel engines used to power cranes and welding equipment.
- 2. The engine shall only be used to power a crane or welding equipment.
- 3. The operator shall maintain data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine.
- 4. Permittee shall perform routine surveillance of the diesel-fired engine to ensure that compliance with Rule 74.9.D.9 is being maintained.

M:\TITLEV\ATTACH\749N9

# 8. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, "New Source Review" requirements (e.g., BACT and offset requirements), or Rule 29, "Conditions on Permits" requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 7.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment PO (Title V Permit No.) PC#" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

M:\TITLEV\ATTACH\PERMIT8.DOC

# Ventura County Air Pollution Control District Additional Permit Requirements Platform Grace Additional Requirements

Rule 26, "New Source Review"

# Rule 29, "Conditions on Permits"

For this OCS source, conditions applied pursuant to Rule 26 or Rule 29 are federally enforceable.

# **Applicability:**

This attachment applies to Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

- 1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rule 29)
- 2. Combustion equipment listed in the Section No. 2 "Permitted Equipment and Applicable Requirements Table" and the Section No. 3 "Permitted Throughput and Consumption Limit Table" as being fired on natural gas shall only burn natural gas and are not permitted to burn any other fuel. (Rule 26)
- 3. The permitted emissions authorized by this permit are based in part on the fugitive emissions from 16 oil wells. Wells with dual completions are considered separate oil wells. This platform currently has 11 oil well completions. An Authority to Construct is required to be obtained from the District prior to drilling any wells, unless that activity is a redrill. Emission offsets must also be provided with the submittal of any application to increase the number of wells beyond 16 wells. (Rule 29)

- 4. All diesel fuel consumed in the crane engines, turbines, turbine starter engines, backup generator engine, and in the boats shall contain 0.05% sulfur by weight, or less. In order to comply with this condition, permittee shall maintain fuel records, or certification from the fuel supplier, documenting the sulfur content of each diesel fuel delivery. (Rule 29)
- 5. The permitted emissions for crew boats and work boats servicing this OCS Platform shall not exceed the following limits:

|           | ROC  | NOx   | PM   | SOx  | CO   |
|-----------|------|-------|------|------|------|
| Tons/Year | 1.90 | 32.11 | 1.92 | 0.42 | 5.84 |

In order to comply with this condition, the permittee shall maintain monthly records of diesel fuel consumption for all crew boats and work boats servicing Chevron OCS Platforms Grace and Gail. Boats not owned by Chevron that are providing emergency oil spill response or training shall not be included in these records. The fuel usage, in gallons, shall be allocated 35% to Platform Grace and 65% to Platform Gail for the work boat and 40% to Platform Grace and 60% to Platform Gail for the crewboat. The fuel usage figures, in gallons per month, shall be multiplied by the following District approved emission factors, in units of pounds per thousand gallons (lbs/Mgal), and multiplied by the appropriate conversion factors to obtain emissions in units of tons per month:

|          | ROC   | NOx    | PM    | SOx  | CO     |
|----------|-------|--------|-------|------|--------|
| Lbs/Mgal | 33.15 | 561.00 | 33.50 | 7.50 | 102.00 |

Using these emission factors, the annual permitted emissions for the crew and work boats at this platform are equivalent to an annual diesel fuel limitation of 114,481 gallons per year.

The monthly boat emissions shall be summed for the previous 12 months. The emission totals for the previous 12 months in excess of the above limits shall be considered to be a violation of this condition.

This boat emission calculation method is for the purposes of demonstrating compliance with the above permitted emission limits only. If permittee wishes to submit an application to create an ERC (emission reduction credit) from reducing permitted emissions from boats servicing this platform, an analysis shall be submitted with the application, as required by APCD Rule 26.4.E.2, to demonstrate that the emission reduction is real, quantifiable, permanent, enforceable, and surplus. This analysis shall include, but is not limited to, source test data and actual fuel use data on individual boat engines that may be subject to

an application for ERCs. (Rules 26 and 29)

6. For solvent cleaning activities, including wipe cleaning, permittee shall maintain records of solvent purchase and usage along with records of solvent that is recycled or disposed of properly. Pursuant to Rule 23.F.7, solvents used for facility and building maintenance and repair are exempt from permit. Facility maintenance and repair does not include the use of solvents for maintenance and repair of process and industrial equipment when this activity is being conducted by contractors. (Rule 29)

# Ventura County Air Pollution Control District Additional Permit Requirements 218.8 MMBTU/Hr Low Pressure Flare 1,006.3 MMBTU/Hr High Pressure Flare

Rule 71.1, "Crude Oil Production and Separation" Federally-Enforceable OCS Version Adopted 6/16/92

Rule 29, "Conditions on Permits"

For this OCS source, conditions applied pursuant to Rule 29 are federally enforceable.

# **Applicability:**

This attachment applies to the 218.8 MMBTU/Hr low pressure flare and the 1,006.3 MMBTU/Hr high pressure flare located on Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

- 1. Each flare shall have an individual fuel meter installed to record the amount of natural gas consumed. (Rule 29)
- 2. Each flare shall be equipped and maintained with a continuous pilot or autoignition system to ensure combustion disposal of all excess produced or recovered gases. (Rule 71.1)
- 3. Permittee shall test the flare's ignition system monthly and shall maintain a monthly record of the flare's ignition system tests and maintenance activities, including the test date and operator's initials. (Rule 71.1)
- 4. The permittee shall maintain a monthly record of the volume (MMSCF) of gas combusted in the flare. Pursuant to Rule 23.A.4, safety flares exclusively used for emergency standby for the disposal of process gases in the event of unavoidable process upsets are exempt from permit and therefore, such emergency usage is exempt from the permitted throughput limit for the flare. The permittee shall maintain records which differentiate between emergency usage, and non-emergency usage which includes planned flaring events. The monthly records shall be summed for the previous 12 months. Flare gas combustion totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. (Rule 29)

# Ventura County Air Pollution Control District Additional Permit Requirements Caterpillar Diesel Backup Generator

# Rule 29, "Conditions on Permits"

For this OCS source, conditions applied pursuant to Rule 29 are federally enforceable.

### **Applicability:**

This attachment serves to address the additional requirement that applies to the 600 BHP Caterpillar Diesel Backup Electrical Generator located on Platform Grace. The following condition limits the facility's pounds per hour permitted emissions. This requirement is in addition to any other specific or general requirements referenced in this permit.

# **Conditions:**

1. The 600 BHP Caterpillar D379 diesel fired backup electricity generating engine shall not be fired simultaneously with either of the two 2.8 MW Solar Centaur turbines, except during startup or shutdown transition periods which shall not exceed one (1) hour. Except for maintenance testing, this engine shall only be operated when either turbine or the Waukesha 773 BHP Generator Engine (G-03) cannot be operated due to mechanical malfunction.

# Ventura County Air Pollution Control District Additional Permit Requirements Out of Service Tanks

# Rule 29, "Conditions on Permits"

For this OCS source, conditions applied pursuant to Rule 29 are federally enforceable.

# **Applicability:**

This attachment applies to any tank on permit with Platform Grace that is currently designated as "Out of Service". These requirements are in addition to any other specific or general requirements referenced in this permit.

# **Conditions:**

- 1. Any tank designated as "Out of Service" is shut down and shall not be operated.
- 2. In order to ensure that compliance with this condition is being maintained, permittee shall annually certify that a tank designated as "Out of Service" is shut down and not being operated.

# Ventura County Air Pollution Control District Additional Permit Requirements 773 BHP Waukesha 3521 GSI Generator Engine (G-03)

Rule 74.9, "Stationary Internal Combustion Engines" Adopted 12/21/93, Federally-Enforceable

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

# **Applicability:**

This attachment applies to the 773 BHP Waukesha 3521 GSI Generator Engine (G-03) located on Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

- 1. The emissions of oxides of nitrogen (NOx as nitrogen dioxide) shall not exceed nine (9) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This is a BACT (Best Available Control Technology) requirement of Rule 26 as detailed in Authority to Construct No. 1493-170. (Rule 26)
- 2. The emissions of reactive organic compounds (ROC) shall not exceed fifty (50) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen, measured as methane. This is a BACT requirement of Rule 26 as detailed in Authority to Construct No. 1493-170. (Rule 26)
- 3. The emissions of carbon monoxide (CO) shall not exceed 1600 parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This is a BACT requirement of Rule 26 as detailed in Authority to Construct No. 1493-170. (Rule 26)
- 4. Permittee shall have the engine source tested annually pursuant to Rule 74.9 to determine the NOx, ROC, and CO emissions as detailed above and shall maintain the air to fuel ratio set point (or target) at the catalyst-out position (EG03) at 0.80 volts. This set point shall be monitored, measured, and recorded on a quarterly basis. Prior to conducting the source test, the permittee shall notify the APCD Enforcement Section. Written notification shall be received 15 calendar days prior to the test. Additional monitoring, recordkeeping, reporting, and test method

requirements for this unit are included in Attachment 74.9N3 in Section No. 7 of this permit. (Rule 26 and Rule 74.9)

# Ventura County Air Pollution Control District Additional Permit Requirements 300 BHP Diesel Engine No. 1 (North Crane) 300 BHP Diesel Engine No. 2 (South Crane)

### Rule 29, "Conditions on Permits"

For this OCS source, conditions applied pursuant to Rule 29 are federally enforceable.

### **Applicability:**

This attachment applies to the 300 BHP Diesel Engine No. 1 (North Crane) and the 300 BHP Diesel Engine No. 2 (South Crane) located on Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

## **Conditions:**

- 1. Annual diesel fuel consumption at the North and South Cranes shall not exceed 7,344 gallons per year if there are <u>any</u> producing wells on Platform Grace. Annual diesel fuel consumption at the North and South Cranes shall not exceed 13,344 gallons per year if there are <u>no</u> producing wells on Platform Grace. The annual diesel fuel consumption in excess of 7,344 gallons was permitted without offsetting the emission increase pursuant to California Health and Safety Code Section 42301.13 (Olberg).
- 2. In order to comply with the consumption limits presented in Permit Condition No. 1 above, the permittee shall maintain monthly records of diesel fuel consumption in the crane engines which shall be summed for the previous 12 months. Consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit.

# Ventura County Air Pollution Control District Additional Permit Requirements Out of Service Turbines

# Rule 29, "Conditions on Permits"

For this OCS source, conditions applied pursuant to Rule 29 are federally enforceable.

### **Applicability:**

This attachment applies to the two (2) 3600 BHP Solar Centaur turbines (G-1B and G-1C) located on Platform Grace that are currently designated as "Out of Service". These requirements are in addition to any other specific or general requirements referenced in this permit.

# **Conditions:**

- 1. The two (2) 3600 BHP Solar Centaur turbines (G-1B and G-1C) that are currently designated as "Out of Service" are shutdown and shall not be operated. These units have not demonstrated compliance with Rule 74.23.
- 2. In order to ensure that compliance with this condition is being maintained, permittee shall annually certify that the turbines designated as "Out of Service" are shut down and not being operated.

# 9. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Application General Applicable Requirements Form, Form TV AF25, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) \_\_\_\_\_" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

M:\TITLEV\ATTACH\PERMIT9.DOC

# Ventura County Air Pollution Control District Rule 50 Applicable Requirements Opacity

Rule 50, "Opacity"
Federally-Enforceable Version Adopted 5/23/72
Federally-Enforceable OCS Version Adopted 2/20/79
District-Enforceable Version Adopted 2/20/79

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

# **Applicability:**

This attachment applies to all emissions units at this stationary source.

- 1. Pursuant to Rule 50, permittee shall not discharge into the atmosphere any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.
- 2. Permittee shall perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.
- 3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey

identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9.

4. Upon District request, opacity shall be determined during routine surveillance and during the annual compliance certification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

M:\TITLEV\ATTACH\50

# Ventura County Air Pollution Control District Rule 52 Applicable Requirements Particulate Matter - Concentration (Grain Loading)

Rule 52, "Particulate Matter - Concentration (Grain Loading)" Adopted 5/23/72, Federally-Enforceable

# **Applicability:**

This attachment applies to all external combustion emissions units and internal combustion engines at this stationary source that burn either natural gas or fuel oil. This attachment does not apply to steam generators or gas turbines while combusting liquid or gaseous fuels.

# **Conditions:**

- 1. Pursuant to Rule 52, permittee shall not discharge into the atmosphere from any source particulate matter in excess of the concentration listed in the table shown in Rule 52. For the purpose of Rule 52, particulate matter includes any material which would become particulate matter if cooled to standard conditions.
- 2. Periodic monitoring is not necessary to certify compliance with Rule 52. To certify compliance, a reference to the District analysis of Rule 52 compliance based on EPA emission factors is sufficient.

M:\TITLEV\ATTACH\52

# Ventura County Air Pollution Control District Rule 54.B.1 Applicable Requirements Sulfur Compounds - Sulfur Emissions at Point of Discharge - OCS

Rule 54, "Sulfur Compounds" Federally-Enforceable OCS Version Adopted 6/14/94

# **Applicability:**

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.1 for sulfur emissions at the point of discharge and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

- 1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO<sub>2</sub>) by volume at the point of discharge.
- 2. Pursuant to Rule 54.B.1.b, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 500 ppm by volume from any other operation, calculated as sulfur dioxide (SO<sub>2</sub>) by volume at the point of discharge.
- 3. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.
- 4. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:

- a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.
- b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:
  - 1. Notify the District Enforcement Section as soon as reasonably possible, but no later than four hours after its detection by the operator.
  - 2. Within one week after the flaring event, submit a written report to the District Enforcement Section which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.
- 5. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:
  - a. Permittee shall provide a 72 hour written notification to the District Enforcement Section as required by Rule 54.C.2.a.
  - b. Permittee shall have a planned flare management plan in place and approved by the District Enforcement Section as required by Rule 54.C.2.b.
  - c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO<sub>2</sub>) during the entire flaring event as required by Rule 54.C.2.c.
  - d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Enforcement Section in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.
  - e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Enforcement Section no later than 15 days after the end of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO<sub>2</sub>.

- 6. Permittee shall maintain a representative fuel analysis or exhaust analysis to ensure that compliance with Rule 54.B.1 is being maintained. This analysis shall be provided to the District upon request.
- 7. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

M:\TITLEV\ATTACH\54B1OCS

# Ventura County Air Pollution Control District Rule 54.B.2 Applicable Requirements Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level - OCS

Rule 54, "Sulfur Compounds" Federally-Enforceable OCS Version Adopted 6/14/94

# **Applicability:**

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.2 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

- 1. Pursuant to Rule 54.B.2, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.
- 2. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.
- 3. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:
  - a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.

- b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:
  - 1. Notify the District Enforcement Section as soon as reasonably possible, but no later than four hours after its detection by the operator.
  - 2. Within one week after the flaring event, submit a written report to the District Enforcement Section which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.
- 4. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:
  - a. Permittee shall provide a 72 hour written notification to the District Enforcement Section as required by Rule 54.C.2.a.
  - b. Permittee shall have a planned flare management plan in place and approved by the District Enforcement Section as required by Rule 54.C.2.b.
  - c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO<sub>2</sub>) during the entire flaring event as required by Rule 54.C.2.c.
  - d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Enforcement Section in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.
  - e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Enforcement Section no later than 15 days after the end of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO<sub>2</sub>.

- 5. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54.B.2 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.
- 6. Upon District request, pursuant to Rule 54.D.2, ground or sea level concentrations of SO<sub>2</sub> shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide with the following amendments:
  - a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.
  - b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements," EPA/600/4-90/003.
  - c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

M:\TITLEV\ATTACH\54B2OCS

# Ventura County Air Pollution Control District Rule 57.B Applicable Requirements Combustion Contaminants - Specific - Fuel Burning Equipment

Rule 57.B, "Combustion Contaminants - Specific", Fuel Burning Equipment Federally-Enforceable Version Adopted 8/17/76
Federally-Enforceable OCS Version Adopted 6/14/77
District-Enforceable Version Adopted 6/14/77

Compliance with the conditions listed below for the 6/14/77 version of the rule will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

# **Applicability:**

This attachment applies to all external combustion emission units, internal combustion engines, and gas turbines at this stationary source that burn either natural gas or fuel oil.

### **Conditions:**

- 1. Pursuant to Rule 57.B, permittee shall not discharge into the atmosphere from any fuel burning equipment combustion contaminants exceeding in concentration at the point of discharge, 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide (CO<sub>2</sub>) at standard conditions.
  - Combustion contaminants are defined as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state.
- 2. Periodic monitoring is not necessary to certify compliance with Rule 57.B. To certify compliance, a reference to the District analysis based on EPA emission factors and a representative source test is sufficient.

 $M: \backslash TITLEV \backslash ATTACH \backslash 57B$ 

# Ventura County Air Pollution Control District Rule 64 Applicable Requirements Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels" Federally-Enforceable Version Adopted 7/5/83 Federally-Enforceable OCS Version Adopted 6/14/94 District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

### **Applicability:**

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuel.

- 1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), except for natural gas which is limited to 15 grains per 100 cubic feet (236 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64. Natural gas is a gaseous fuel purchased or transported under a Federal Energy Regulatory Commission or a California Public Utility Commission (PUC) jurisdictional tariff.
- 2. If only PUC-quality natural gas is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements.
- 3. If other than PUC-quality natural gas is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 Determination of Sulfur in a Gaseous Matrix. This annual fuel analysis shall be maintained at the facility and shall be provided to the District with the annual compliance certification.

# Ventura County Air Pollution Control District Rule 64 Applicable Requirements Sulfur Content of Fuels - Solid or Liquid Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Federally-Enforceable Version Adopted 7/5/83
Federally-Enforceable OCS Version Adopted 6/14/94
District-Enforceable Version Adopted 6/14/94

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

### **Applicability:**

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting solid or liquid fuel. This attachment does not apply to any combustion emission unit with sulfur emission controls.

## **Conditions:**

- 1. Pursuant to Rule 64, no person shall burn any solid or liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.
- 2. For each solid or liquid fuel delivery, permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-83 or D2622-87, to ensure that compliance with Rule 64 is being maintained. The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

 $M: \backslash TITLEV \backslash ATTACH \backslash 64B2$ 

# Ventura County Air Pollution Control District Rule 68 Applicable Requirements Carbon Monoxide

Rule 68, "Carbon Monoxide" Federally-Enforceable Version Adopted 5/23/72 Federally-Enforceable OCS Version Adopted 6/14/77 District-Enforceable Version Adopted 6/14/77

Compliance with the conditions listed below will ensure compliance with both versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

# **Applicability:**

This attachment applies to all external combustion emission units at this stationary source that burn either natural gas or fuel oil. This attachment does not apply to internal combustion engines.

# **Conditions:**

- 1. Pursuant to Rule 68, permittee shall not discharge into the atmosphere carbon monoxide (CO) in concentrations exceeding 2,000 ppm by volume measured on a dry basis at standard conditions.
- 2. Periodic monitoring is not necessary to certify compliance with Rule 68. To certify compliance, a reference to the District analysis of Rule 68 compliance based on EPA emission factors is sufficient.

M:\TITLEV\ATTACH\68

# Ventura County Air Pollution Control District Rule 71.1.C Applicable Requirements Crude Oil Production and Separation - Produced Gas

Rule 71.1, "Crude Oil Production and Separation" Adopted 6/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

# **Applicability:**

This attachment applies to the emissions of produced gas from equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production unit prior to custody transfer. Specifically, this attachment applies to gas collection systems that are hard-piped and closed systems that direct all produced gas to a fuel or sales gas system or to a flare.

- 1. Pursuant to Rule 71.1.C.1, the emissions of produced gas shall be controlled at all times using a properly maintained and operated closed system that directs all gas, except gas used in a tank battery vapor recovery system, to one of the following:
  - a. A fuel or sales gas system
  - b. A flare that combusts reactive organic compounds
- 2. Pursuant to Rule 71.1.C.2, the provisions of Rule 71.1.C.1 shall not apply to wells which are undergoing routine maintenance, or to exploratory wells (during the first two weeks of production) if the composition of the produced gas is unknown (i.e., new reservoir) and there are no existing gas handling systems within 150 feet of the well.
- 3. Permittee shall annually certify the produced gas collection system to ensure that compliance with Rules 71.1.C.1 is being maintained. This annual certification shall include a visual inspection assuring that the produced gas collection system is a closed system.
- 4. If a flare is used to control the produced gas, permittee shall inspect the flare on a quarterly basis to ensure that it is operating properly. A record of these

inspections shall be maintained at the facility and shall be submitted to the District upon request.

5. The gas collection system's gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the gas collection system ensures compliance with the maintenance requirements of Rule 71.1.C.1.

M:\TITLEV\ATTACH\711C

# Ventura County Air Pollution Control District Rule 71.4.B.1 Applicable Requirements First Stage Sump Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars" Adopted 6/8/93, Federally-Enforceable

# **Applicability:**

This attachment applies to any first stage production sump at this stationary source. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system. A sump is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand, or other material in petroleum production operations".

### **Conditions:**

- 1. Pursuant to Rule 71.4.B.1, no person shall install, maintain, or operate a first stage production sump. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system.
- 2. In order to ensure that compliance with Rule 71.4.B.1 is being maintained, permittee shall annually certify that there are no first stage production sumps at the facility.

M:\TITLEV\ATTACH\714B1

# Ventura County Air Pollution Control District Rule 71.4.B.3 Applicable Requirements Well Cellar Storage Prohibition

# Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars" Adopted 6/8/93, Federally Enforceable

# **Applicability:**

This attachment applies to any well cellar at this stationary source. This attachment addresses the requirements of Rule 71.4.B.3 which prohibits the storage of crude oil or petroleum material in a well cellar. Rule 71.4 applies to well cellars at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored.

A well cellar is a lined or unlined area around one or more oil wells, allowing access to the wellhead components for servicing and/or installation of blowout prevention equipment.

# **Conditions:**

- 1. Pursuant to Rule 71.4.B.3, no person shall store crude oil or petroleum material in a well cellar except during periods of equipment maintenance or well workover. In no case shall storage occur for more than five (5) calendar days.
- 2. Pursuant to Rule 71.4.C, the provisions of Rule 71.4 shall not apply to well cellars used in an emergency, if clean-up procedures are implemented within 24 hours after each emergency occurrence and if clean-up procedures are completed within fifteen (15) calendar days.
- 3. Permittee shall perform routine surveillance and visual inspections of well cellars to ensure that compliance with Rule 71.4.B.3 is being maintained.
- 4. Pursuant to Rule 71.4.D.2, any person storing crude oil in a well cellar during periods of equipment maintenance or well workover shall maintain records, which may include but are not limited to, workover invoice documents, indicating the date(s) the material was stored in the well cellar or the date(s) of workover activity. These records shall be submitted to the District upon request.

M:\TITLEV\ATTACH\714B3

# Ventura County Air Pollution Control District Rule 74.6 Applicable Requirements Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing" Federally-Enforceable Version Adopted 12/10/91 Federally-Enforceable OCS Version Adopted 5/8/90 District-Enforceable Version Adopted 7/9/96

Compliance with the conditions listed below for the 7/9/96 version of the rule will ensure compliance with all three versions of this rule. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

### **Applicability:**

This attachment applies to all solvent cleaning activities at this stationary source. This attachment does not apply to cleanup and substrate surface preparation regulated by other APCD surface coating and solvent rules. Solvent cleaning is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, such solvents are required to comply with Rule 74.6.

Surface cleaning conducted in a degreaser that complies with the requirements of APCD Rule 74.6.1, "Cold Cleaners", APCD Rule 74.6.2, "Batch Loaded Vapor Degreasers", or APCD Rule 74.6.3, "Conveyorized Degreasers", are exempt from the solvent requirements and cleaning devices and methods requirements of Rule 74.6.B.1 and 74.6.B.2.

- 1. Pursuant to Rule 74.6.B.1, effective July 9, 1997, solvent cleaning activities shall meet the following requirements:
  - Solvents used for repair and maintenance cleaning shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 20 mmHg at 20°C, as applied.

- b. Solvents used for cleanup, including cleaning of application equipment, shall not exceed an ROC content of 950 grams per liter and an ROC composite partial pressure of 35 mmHg at 20°C, as applied.
- c. Solvents used for manufacturing or surface preparation shall not exceed an ROC content of 70 grams per liter.
- 2. Pursuant to Rule 74.6.B.2, effective July 9, 1997, no person shall perform solvent cleaning unless one of the following cleaning devices or methods is used:
  - Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;
  - b. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;
  - c. Non-atomized solvent flow, dip, or flush method where pooling is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;
  - d. A properly used enclosed gun washer or low emission spray gun cleaner.
- 3. Pursuant to Rule 74.6.B.3.a, no person shall atomize solvent into open air.
- 4. Pursuant to Rule 74.6.B.3.b, no person shall allow liquid cleaning solvent to leak from any equipment or container.
- 5. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying.
- 6. Pursuant to Rule 74.6.B.4.b, all waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.
- 7. Pursuant to Rule 74.6.C.1, Rule 74.6 shall not apply to:
  - a. Cleaning activities using cleaning agents that contain two percent or less organic solvent, as applied by weight.

- b. Cleaning activities using solvents which are purchased in, and applied from, manufacturer- or distributor-labeled containers of one liter or less in volume, including aerosol products.
- c. Janitorial cleaning including graffiti removal.
- d. Cleaning activities conducted at residences, schools, medical care facilities, prisons, restaurants, health clubs and theaters.
- e. Stripping of cured coatings (e.g.; stripping), cured adhesives (e.g.; debonding, ungluing), and cured inks.
- f. Cleaning activities subject to any provision, including recordkeeping and exemption provisions, of the APCD Rules listed in Rule 74.6.C.1.f.

# 8. Pursuant to Rule 74.6.C.2, Rule 74.6 shall not apply to:

- a. Any cleaning device or mechanism and associated operating conditions which has been approved in writing by the Air Pollution Control Officer (and which may be operated pending approval by the Environmental Protection Agency and the California Air Resources Board) to result in emissions lower than the emissions that would result if the cleaning were performed in compliance with the requirements of those rules.
- b. Any cleaning device or mechanism for which emissions are regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).

# 9. Pursuant to Rule 74.6.C.3, Rule 74.6.B.1 shall not apply to:

- a. Cleaning of electronic components or medical devices using solvent with an ROC composite partial pressure of 33 mm Hg at 20°C or less and an ROC content of 900 g/l or less. The use of isopropyl alcohol shall be deemed in compliance with this requirement.
- b. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.
- c. Cleaning in laboratory tests and analyses, or bench scale or short term research and development programs.

- d. Removal of elemental sodium from the inside of pipes and lines.
- e. Cleaning of mold release compounds from molds.
- f. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.
- g. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxiode, liquid oxygen or hydrazine.
- h. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall maintain records of the volume and formulation of non-compliant solvent used on a weekly basis.
- 10. Pursuant to Rule 74.6.C.4, Rule 74.6.B.1 and Rule 74.6.B.2 shall not apply to:
  - a. Aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l as applied or less.
  - b. Surface cleaning conducted in a degreaser that complies with the requirements of APCD Rules 74.6.1, 74.6.2, or 74.6.3, as applicable.
- 11. Pursuant to Rule 74.6.D, permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:
  - a. Solvent name and manufacturer's description.
  - b. All intended uses of the solvent at the facility, classified as follows:
    - 1. Repair or maintenance cleaning, or
    - 2. Cleanup, including application equipment cleaning, or
    - 3. Manufacturing or surface preparation cleaning, or
    - 4. Solvent used pursuant to an exemption in Rule 74.6.C (specify the exemption claimed).

- c. The ROC content (and ROC composite partial pressure, if applicable) of the solvent.
- d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be submitted to the District upon request.

- 12. Permittee shall perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:
  - a. Pursuant to Rule 74.6.E.1, the ROC content of materials shall be determined by EPA Test Method 24 or 24A.
  - b. Pursuant to Rule 74.6.E.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.
  - c. Pursuant to Rule 74.6.E.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.
  - d. Pursuant to Rule 74.6.E.6, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.E.5.
  - e. Pursuant to Rule 74.6.E.7, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a

minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.

M:\TITLEV\ATTACH\746

# Ventura County Air Pollution Control District Rule 74.10 Applicable Requirements Components at Crude Oil and Natural Gas Production and Processing Facilities

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Adopted 6/16/92, Federally-Enforceable

### **Applicability:**

This attachment applies to the crude oil and natural gas production and processing facilities, and to natural gas processing plants, at this stationary source. This attachment summarizes the fugitive leak and leak inspection requirements of Rule 74.10, except for those requirements specified under Rule 74.10.B.3. Rule 74.10.B.3 requirements, which are covered in a separate attachment, only apply to natural gas processing plants, except for those plants that are less than 10 million standard cubic feet per day capacity and do not fractionate natural gas liquids.

A crude oil production and processing facility is any facility where crude oil production and processing are conducted as defined in the Standard Industrial Classification Code 1311. A natural gas processing plant is defined as a facility engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products such as ethane, propane, butane, and natural gasoline. Excluded from the definition of natural gas processing plant are compressor stations, dehydration units, sweetening units, field treatment, underground storage facilities, liquefied natural gas units, and field gas gathering systems unless these facilities are located at a natural gas processing plant. This attachment does not apply to petroleum refineries.

#### **Conditions:**

- 1. Pursuant to Rule 74.10.B.1, hatches shall be closed at all times except during sampling or attended maintenance operations.
- 2. Pursuant to Rule 74.10.B.2, no person shall use a component at a crude oil or natural gas production facility, or a natural gas processing plant, if such component leaks (as defined in Rule 74.10.J.9) reactive organic compounds when the applicable maximum leak threshold for that component category as listed in Attachment 1 of Rule 74.10 has been exceeded at the facility after the applicable effective date in any calendar quarter. Rule 74.10.B.2 shall not apply to components that are tagged and repaired in accordance with Rule 74.10.C and 74.10.E.

- 3. Pursuant to Rule 74.10.C.1, permittee shall visually inspect pumps, including but not limited to rod pumps and compressor pumps, not less than weekly for liquid leaks.
- 4. Pursuant to Rule 74.10.C.2, permittee shall monitor the following components at least every quarter for gaseous leaks in accordance with EPA Reference Method 21. All other components not listed below, except flanges designated in the Operator Management Plan as exempt from inspection requirements, shall be monitored at least annually in accordance with EPA Reference Method 21:
  - a. Valves
  - b. Packing seals on dump lever arms connected to gas traps, separators, or vessels
  - c. Hatches on non vapor recovery tanks
  - d. Polished rod stuffing boxes
  - e. At natural gas processing plants: compressor seals, pressure relief devices, and pumps

As detailed in Rule 74.10.C.4, permittee may qualify for annual, rather than quarterly, monitoring of specified components by achieving a good performance level for five consecutive quarters and submitting a written request to the District Enforcement Section. A reduction in monitoring frequency will not become effective until written approval by the District is received by the permittee. Pursuant to Rule 74.10.C.5, quarterly monitoring shall be reinstated by the permittee during the next calendar quarter upon failure to achieve a good performance level.

- 5. In addition to the weekly and quarterly monitoring required above, permittee shall perform routine surveillance of the applicable components to ensure that compliance with Rule 74.10 is being maintained. This routine surveillance shall include verifying that proper operation and equipment and inspection requirements are being met.
- 6. Pursuant to Rule 74.10.C.3, upon detection, permittee shall affix a readily visible tag to all leaking components with the date that leaks are detected. The tag shall remain affixed until the component is repaired free of leaks as shown by reinspection.
- 7. Pursuant to Rule 74.10.D, permittee shall submit an Operator Management Plan to the District Enforcement Section for approval. No provision in the Operator Management Plan, approved or not, shall conflict with or take precedence over

any provision of Rule 74.10. The Operator Management Plan shall identify any component exempt from Rule 74.10 (as detailed in Rule 74.10.F) or part of Rule 74.10, and describe the procedures that the permittee intends to use to comply with the requirements of Rule 74.10. The Operator Management Plan must identify all components detailed in Rule 74.10.D.1.

Permittee shall submit a new or modified Operator Management Plan to the District Enforcement Section for approval for a modification to this facility covered under an existing plan.

Permittee shall be required, upon written request by the District, to re-qualify, by analysis, any exemption(s) from Rule 74.10 or part of Rule 74.10 if the exemption(s) may no longer be valid based on the changed composition of the process stream. The results of that analysis and any modification to the Operator Management Plan shall be submitted to the District Enforcement Section within 90 days after receipt of the District request.

If the exempt status of a component is affected by a revision to this rule, then the Operator Management Plan shall be modified accordingly. The modification to the Operator Management Plan shall be submitted to the District Enforcement Section no later than 90 days after adoption of the rule revision.

8. Pursuant to Rule 74.10.E, any component found leaking shall be repaired to a leak free condition as soon as practicable but no later than 21 days from the detection date. Any component found leaking at a natural gas processing facility shall be repaired to a leak free condition no later than 15 days from the detection date.

A leaking component which is an essential part of a critical process unit identified in an approved Operator Management Plan must be repaired during the next scheduled shutdown or process turnaround of the unit, but not later than three (3) months from the date of detection.

Permittee shall re-inspect components for leaks as soon as practicable, but not later than one week after the date on which the component is repaired.

Any component leak identified by the District shall be repaired and inspected according to the timeframes required above by this condition.

9. Pursuant to Rule 74.10.H, the following test methods shall be used to demonstrate compliance with Rule 74.10 or to qualify for an exemption from Rule 74.10:

- a. Pursuant to Rule 74.10.H.1, gaseous leaks from components shall be determined by EPA Method 21 by using an appropriate analyzer calibrated with methane. The calibration maintenance, and operation of the appropriate analyzer shall follow the manufacturer's recommendations.
- b. Pursuant to Rule 74.10.H.2, the ROC concentration, by weight, of gaseous process streams shall be measured by ASTM E168-67 (General Techniques of Infrared Qualitative Analysis), ASTM E169-63 (General Techniques of Ultraviolet Quantitative Analysis), or ASTM E260-73 (Gas Chromatography), or updated versions of these methods approved by EPA and published in the 40 CFR Part 60.
- c. Pursuant to Rule 74.10.H.3, the ROC concentration, by weight, of liquid process streams not at natural gas processing plants, shall be measured using ASTM Method D96 (Water Cut and Sediment). The ROC concentration of the liquid shall be the material remaining after separating the water and sediment.
- d. Pursuant to Rule 74.10.H.4, the API gravity of crude oil shall be determined using ASTM Method D287.
- 10. Pursuant to Rule 74.10.G, permittee shall maintain an inspection log containing, at a minimum, the following:
  - a. The location, type, description of each leaking component inspected, and name of any operating unit where each leaking component is found
  - b. Date of leak detection and method of detection
  - c. Date that leak is repaired to a leak free condition, and date of re-check
  - d. Identification of leaks from critical process units
  - e. Number of components inspected, number and percentage of leaking components found, categorized by the following groups:
    - 1. Hatches
    - 2. Polished rod stuffing boxes
    - 3. Dump lever arms
    - 4. Valves (not open ended)
    - 5. Open ended lines
    - 6. Flanges (if designated in Operator Management Plan as exempt from inspection requirements)
    - 7. Other components

This information shall be submitted to the District upon request.

# Ventura County Air Pollution Control District Rule 74.22 Applicable Requirements Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces" Adopted 11/9/93, Federally-Enforceable

# **Applicability:**

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

# **Conditions:**

- 1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:
  - I. with NOx (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)
  - II. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)
- 2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.
- 3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

# 10. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Application General Applicable Requirements Form, Form TV AF25, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) \_\_\_\_\_" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

M:\TITLEV\ATTACH\PERMIT10.DOC

# Ventura County Air Pollution Control District Rule 74.1 Applicable Requirements Abrasive Blasting

Rule 74.1, "Abrasive Blasting" Federally-Enforceable OCS Version Adopted 11/12/91 District-Enforceable Version Adopted 11/12/91

The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

# **Applicability:**

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

#### **Conditions:**

- 1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:
  - a. Steel or iron shot/grit is used exclusively
  - b. The item to be blasted exceeds eight feet in any dimension
  - c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted
- 2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:
  - a. Wet abrasive blasting
  - b. Hydroblasting

- c. Vacuum blasting
- d. Dry blasting with California ARB certified abrasives
- 3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.
- 4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.
- 5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.
- 6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.
- 7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

- a. Date of operation
- b. Type of abrasive blasting media used
- c. Identity, size, and location of item blasted
- d. Whether operation was conducted inside or outside a permanent building
- e. California ARB certifications for abrasives used

These records shall be maintained at the facility and submitted to the District upon request.

# Ventura County Air Pollution Control District Rule 74.2 Applicable Requirements Architectural Coatings

Rule 74.2, "Architectural Coatings"
Federally-Enforceable Version Adopted 11/22/83
Federally-Enforceable OCS Version Adopted 8/11/92
District-Enforceable Version Adopted 8/11/92

The District-enforceable version of this rule has been determined by EPA to be more stringent than the current SIP version of the rule and therefore compliance with the conditions listed below for the 8/11/92 version of the rule will ensure compliance with the current federally-enforceable requirements for all subject sources. The District-enforceable version of this rule will become federally enforceable when approved by EPA as part of the SIP.

### **Applicability:**

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. Architectural coatings are coatings applied to stationary structures and their appurtenances, to mobile homes, to pavements, or to curbs.

#### **Conditions:**

- 1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of general architectural coatings, except specialty coatings shall not exceed 250 grams per liter of coating excluding water, exempt organic compounds and any colorant added to tint bases, unless specifically exempted by Rule 74.2.
- 2. Pursuant to Rule 74.2.B.3, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.
- 3. Pursuant to Rule 74.2.B.6, the VOC content of lacquers shall not exceed 680 grams per liter of coating as applied, excluding water; the VOC content of industrial maintenance primers and topcoats shall not exceed 420 grams per liter of coating as applied, excluding water; and the VOC content of quick-dry enamels shall not exceed 400 grams per liter of coating as applied, excluding water.

- 4. Pursuant to Rule 74.2.B.7, all VOC-containing materials shall be stored in closed containers when not in use.
- 5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.
- 6. Pursuant to Rule 74.2.E, the VOC content of architectural coatings shall be measured using EPA Method 24, the VOC content from exempt organic compounds shall be measured using CARB Method 432, the acid content of pretreatment wash primers shall be measured using ASTM Method D 1613-85 (modified), and the metal content of metallic pigmented coatings shall be measured using SCAQMD Method 311-91.

M:\TITLEV\ATTACH\742

# Ventura County Air Pollution Control District 40 CFR Part 61, Subpart M Applicable Requirements National Emission Standard for Asbestos

40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos" Federally-Enforceable

# **Applicability:**

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

# **Conditions:**

- 1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos". The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation".
- 2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

M:\TITLEV\ATTACH\CFR61M

# 11. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

M:\TITLEV\ATTACH\PERMIT11.DOC

# Ventura County Air Pollution Control District General Part 70 Permit Conditions

- 1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.A.6)
- 2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.
- 3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)
- 4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.A.7)
- 5. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)
- 6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part

70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.A.10)

- 7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:
  - a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and
  - d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

(40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.1)

- 8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.A.8)
- 9. A Part 70 permit shall be reopened under the following conditions:
  - a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;

- b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;
- c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or
- d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

- 10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.A.11)
- 11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.A.9)
- 12. If any term or condition of this Part 70 permit shall for any reason be adjudged by a court of competent jurisdiction to be unconstitutional or invalid, such judgment shall not effect or invalidate the remainder of this Part 70 permit, but shall be confined in its operation to the term or condition directly involved in the controversy in which such judgment shall have been rendered. It is hereby declared to be the intent of the District, that this Part 70 permit would have been issued and enforced in any case had such invalid term or condition not been included. (40 CFR 70.6(a)(5), APCD Rule 33.3.A.5)
- 13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)
- 14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70

permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.6(c)(5), APCD Rule 33.9.D)

15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the date of the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance was continuous or intermittent since the last certification, the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.6(c)(5), APCD Rule 33.3.B.3, APCD Rule 33.9.C)

M:\TITLEV\ATTACH\PART70GN

# **Ventura County Air Pollution Control District General Permit to Operate Conditions**

- 1. Within 10 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)
- 2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)
- 3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)
- 4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

M:\TITLEV\ATTACH\POGNCN

# 12. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label "Attachment 40CFR(Part No.) \_\_" in the lower left corner of each attachment.

 $M: \label{eq:main_main_permutation} M: \label{eq:main_main} ITLEV \label{eq:main_permutation} ATTACH \label{eq:main_permutation} PERMIT12.DOC$ 

# Ventura County Air Pollution Control District 40 CFR Part 55 Applicable Requirements Outer Continental Shelf Air Regulations

# 40 CFR Part 55, "Outer Continental Shelf Air Regulations" Federally-Enforceable

# **Applicability:**

This attachment applies to Platform Grace since it is an existing outer continental shelf (OCS) source. 40 CFR Part 55 and related consistency updates detail the District rules that apply to OCS sources. Attachments contained in this permit use the term "Federally-Enforceable OCS Version" to designate those rules that are federally-enforceable at OCS sources via 40 CFR Part 55.

### **Conditions:**

1. Permittee shall comply with 40 CFR Part 55, "Outer Continental Shelf Air Regulations". Permittee shall also comply with Rule 72.1, "Outer Continental Shelf Air Regulations". Rule 72.1 incorporates the following provisions of 40 CFR Part 55:

| Section 55.1        | Statutory authority and scope                         |
|---------------------|---|
| Section 55.2        | Definitions   |
| Section 55.3        | Applicability   |
| Section 55.4        | Requirement to submit a notice of intent              |
| Section 55.5        | Corresponding onshore area designation                |
| Section 55.6        | Permit requirements                                   |
| Section 55.7        | Exemptions  |
| Section 55.8        | Monitoring, reporting, inspections, and compliance    |
| Section 55.9        | Enforcement   |
| Section 55.10       | Fees  |
| Section 55.13       | Federal requirements that apply to OCS sources        |
| Section 55.14 a,b,c | Requirements that apply to OCS sources located within |
|                     | 25 miles of states' seaward boundaries, by state      |

M:\TITLEV\ATTACH\ CFR55

# Ventura County Air Pollution Control District 40 CFR Part 68 Applicable Requirements Accidental Release Prevention and Risk Management Plans

40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable

### **Applicability:**

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.140. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

## **Conditions:**

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

M:\TITLEV\ATTACH\CFR68

# Ventura County Air Pollution Control District 40 CFR Part 82 Applicable Requirements Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone" 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners" 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction" Federally-Enforceable

### **Applicability:**

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners. An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

#### **Conditions:**

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

M:\TITLEV\ATTACH\CFR82

# 13. TITLE V PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit. During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is also contained in this section of the permit.

The permit application is presented as submitted by the facility. Additional information received after the application was deemed complete is contained as a separate section at the end of the application. This additional information is accompanied by a TVAF-60 "Modification to Part 70 Permit Application" form and has also been copied and placed in its designated section in the original permit application package. Pages copied on "green" paper are new or modified submittals. If a new page has replaced an existing page, the existing page has been stamped "REPLACED". Any page that has been identified for removal, has been removed from the original application and has been placed in a "REMOVED" section near the end of the application.

M:\TITLEV\ATTACH\PERMIT13.DOC